UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

CREIGHTON TAKATA, individually and on behalf of all others similarly situated,

Plaintiff,

v.

RIOT BLOCKCHAIN, INC. f/k/a BIOPTIX, INC., JOHN O'ROURKE, JEFFREY MCGONEGAL, BARRY HONIG, CATHERINE DEFRANCESCO, MICHAEL BEEGHLEY, JOHN STETSON, MARK GROUSSMAN, ANDREW KAPLAN,

MIKE DAI, JASON LES and ERIC SO,

Defendants.

Case No. 3:18-cv-02293 (FLW) (ZNQ)

NOTICE OF JOINDER IN DEFENDANTS' OPPOSITION TO LEAD PLAINTIFF'S MOTION FOR LEAVE TO FILE [PROPOSED] CONSOLIDATED SECOND AMENDED CLASS ACTION COMPLAINT

Defendant Catherine DeFrancesco respectfully joins in the relief requested in the June 22, 2020 Memorandum of Law in Support of Defendants' Opposition to Lead Plaintiff's Motion for Leave to File [Proposed] Consolidated Second Amended Class Action Complaint (the "Opposition") (ECF No. 171).

For the reasons set forth in the Opposition, Defendant Catherine DeFrancesco respectfully requests that the Court grant the relief requested in the Opposition.

DATED: June 22, 2020 Respectfully submitted,

By: /s/ Jaclyn M. Palmerson

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Attorneys for Catherine DeFrancesco

CERTIFICATE OF SERVICE

I, Jaclyn M. Palmerson, hereby certify that, on June 22, 2020, I electronically transmitted the foregoing Notice of Joinder via the Court's CM/ECF System to the CM/ECF registrants on record in this matter.

/s/ Jaclyn M. Palmerson
Jaclyn M. Palmerson